

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 21-CR-102-CVE

**WILLIAM DONOVAN
JOHNSON III,
a/k/a “Billy Johnson,”
DAVID SCOTT CHAMBERS,
a/k/a “Scott Chambers,”
GENE OLEN CHARLES RAST,
SHAUNI BREANNE CALLAGY,
RENEE LYNN HAYNES,
LUIS ALFREDO JACOBO,
a/k/a “Lokz,”
JESUS VALDEZ MARTINEZ,
a/k/a “Jesse Martinez,”
a/k/a “Hostile,”
KELLY WAYNE BRYAN,
CURTIS ANTHONY JONES,
ANTONIO CERVANTES GARCIA
a/k/a “Tony Garcia”**

Defendants.

Government’s Notice of Intent to Call Expert Witness

The United States of America, by and through Thomas E. Duncombe, Nathan E. Michel and Melody Noble Nelson, Assistant United States Attorneys, pursuant to Federal Rule of Criminal Procedure 16(a)(1)(E), hereby provides notice to the defendant that the Government intends to use the following witnesses in its case in chief. The government provides notice as follows:

Chris G. Boydstun
Senior Criminalist, Oklahoma State Bureau of Investigation

Qualifications: Witness's Curriculum Vitae will be provided to defense counsel in advance of trial.

Bases and Reasons for Opinions: The referenced witness will testify concerning his analysis of two batches of evidence in this case. He will testify as to his procedure and methodology for testing for controlled substances, his handling of evidence and his documentation of same. The witness will testify that his analysis involved the application of scientific disciplines including chemistry and forensic science.

Lab Report 2018-018462

Items analyzed:

1. One plastic bag containing a crystal-like substance, net weight 89.18 grams
2. One plastic bag containing a crystal-like substance, net weight .90 grams

Results of analysis:

Items 1 and 2 contained methamphetamine, Schedule II, total +/- 0.10 grams.

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography with Flame Ionization Detector and Gas Chromatography with Mass Spectrometry

Lab Report 2018-015969

Items analyzed:

ITEM	DESCRIPTION
1A	One plastic bag marked "Pouch Number #1" containing one glass smoking device containing residue
1B	One plastic bag marked "Pouch Number #2" containing one red plastic bag containing residue
1C	One plastic bag marked "Pouch Number #3" containing one ripped plastic bag containing a green leafy substance, net weight 4.07
1D	One factory sealed black foil package listed as containing "Medical Cannabis", gross weight 2.99 grams
1E	One plastic bag marked "#4a DBL DOSED Cherry Colas" containing one red and brown gummy candy, net weight 3.96 grams
1F	One plastic bag marked "4b" containing three brown gummy candies, gross weight 4.90 grams
1G	One plastic bag marked "Pouch Number #5" containing one tan digital scale containing a residue One
1H	One plastic bag marked "Pouch Number #9" containing one pink cloth zipper pouch containing one plastic bag containing a crystalline substance, net weight 66.45 grams
1I	Five Factory sealed foil packages, each marked "Suboxone 2 mg/0.5 mg"
1J	One orange prescription bottle marked "10a 10b 10c" containing items 1J through 1M "Three blue tablets, each marked "DAN 5620/ 10"
1K	One cellphone wrapper marked "10c" containing three white oval tablets, each marked "M367"

1L	Two white round tablets, each marked "CL 022" and one tablet fragment
1M	One white oval tablet marked "M367"
1N	Two factory sealed foil packages, each marked "Suboxone 8 mg/2 mg"
1O	One plastic bag marked "10e" containing a crystalline substance, net weight 9.98
1P	One plastic bag marked "10F" containing a crystalline substance, net weight 3.14 grams
1Q	One plastic bag marked "Pouch Number #14" containing one can bottom containing a residue
1R	One plastic bag containing marked "Pouch Number #15" containing items 1S through 1W and a brown tar-like substance, net weight 0.16 grams
1S	One plastic bag containing a black tar-like substance, net weight 1.79 grams
1T	One plastic bag containing a one piece of pink paper marked "15" and a black tar-like substance, net weight 1.58 grams
1U	One plastic bag containing one plastic bag containing a black residue
1V	One metal spoon containing black tar-like substance, net weight 0.25
1W	One pie tin containing a black tar-like substance, net weight 0.19 grams

Results of analysis:

ITEMS	ANALYSIS
1A, 1B, 1G	Methamphetamine, Schedule II
1H, 1O, 1P	Methamphetamine, Schedule II, total net weight: 79.57 grams +/- 0.15 grams
1C	Cannabis (Marihuana containing Tetrahydrocannabinol), Schedule I
1D, 1F, 1I, 1N, 1U	Not Analyzed
1E	Tetrahydrocannabinols, Schedule III
1J	Diazepam, Schedule IV
1K	Hydrocodone, Schedule II
1L	Carisoprodol, Schedule IV
1M	Visual and literary examinations indicate Hydrocodone, Schedule II. Instrumental analysis was not performed
1Q, 1R	No Controlled Dangerous Substances Identified
1S	Heroin, Schedule I
1T, 1V	Methamphetamine, Schedule II and Morphine, Schedule II
1W	Methamphetamine, Schedule II, Morphine, Schedule II and Heroin, Schedule I, Codeine, Schedule II

In general, the witness applied analysis and testing which consisted of the following steps:

- Literary Reference Examination
- Gas Chromatography with Flame Ionization Detector and Gas Chromatography with Mass Spectrometry
- Microscopic Visual Exam

Opinions, Findings and Conclusions: The information contained herein is merely a summary of the witness' analysis, findings and conclusion. The witness has produced a report. Witness will testify consistent with the prepared report and identify the evidence he analyzed, all of which are included in the government's discovery in this case.

Kriste M. Lemons

Senior Criminalist, Oklahoma State Bureau of Investigation

Qualifications: Witness's Curriculum Vitae will be provided to defense counsel in

advance of trial.

Bases and Reasons for Opinions: The referenced witness will testify concerning her analysis of evidence in this case. She will testify as to her procedure and methodology for testing for controlled substances, her handling of evidence and her documentation of same. The witness will testify that her analysis involved the application of scientific disciplines including chemistry and forensic science.

Lab Report 2020-012350

Items analyzed:

ITEM	DESCRIPTION
1A	One tapped wrapped bundle containing a crystal-like substance, gross weight 2770.71 grams
1B	One tapped wrapped bundle containing a crystal-like substance, gross weight 1347.73 grams
1C	One tapped wrapped bundle containing a crystal-like substance, gross weight 1374.65 grams
1D	One tapped wrapped bundle containing a crystal-like substance, gross weight 1389.21 grams
1E	One tapped wrapped bundle containing a crystal-like substance, gross weight 923.06 grams

Results of analysis:

1A, 1B, 1C, 1D, 1E contained methamphetamine, Schedule II, gross weight 7805.36 grams +/- 0.40 grams.

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography with Flame Ionization Detector and Gas Chromatography with Mass Spectrometry

Opinions, Findings and Conclusions: The information contained herein is merely a summary of the witness' analysis, findings and conclusion. The witness has produced a report. Witness will testify consistent with the prepared report and identify the evidence she analyzed, all of which are included in the government's discovery in this case.

Angela M. Cassady

Senior Forensic Chemist, U.S. Department of Justice, Drug Enforcement Administration

Qualifications: Witness's Curriculum Vitae will be provided to defense counsel in advance of trial.

Bases and Reasons for Opinions: The referenced witness tested several different batches of evidence. For each batch she will testify concerning her analysis of evidence in this case. She will testify as to her procedure and methodology for testing for controlled substances, her handling of evidence and her documentation of same. The witness will testify that her analysis involved the application of scientific disciplines including chemistry and forensic science.

Case Number MG-19-0015

LIMS Number 2021-SFL6-02446

Items analyzed:

4 units of multilayered packaging, 1597 grams

Results of analysis:

4 units tested positive for methamphetamine Hydrochloride, amount pure substance 1583 grams +/- 97 grams

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography/ Mass Spectrometry, Infrared Spectroscopy, Marquis Color Test
- DEA 503/UV-Vis Spectroscopy

Case Number MG-19-0015

LIMS Number 2021-SFL6-02447

Items analyzed:

4 units of multilayered packaging, 1718 grams

Results of analysis:

4 units tested positive for methamphetamine hydrochloride, amount of pure substance 1684 grams +/- 104 grams

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography/ Mass Spectrometry, Infrared Spectroscopy, Marquis Color Test
- DEA 503/UV-Vis Spectroscopy

Case Number 2021550400000901

LIMS Number 2020-SFL6-07860

Items analyzed:

15 units of multilayered packaging, 12904 grams

Results of analysis:

12 of the 15 units tested positive for methamphetamine indicating to at least a 95% level of confidence, that at least 90% of the units in the population contain the substance. A composite was formed from 15 units for further testing. Salt form determined from testing composite.

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography/ Mass Spectrometry, Infrared Spectroscopy, Marquis Color Test
- METH-LC/Liquid Chromatography

Logan P. Jamison

Forensic Chemist, U.S. Department of Justice, Drug Enforcement Administration

Qualifications: Witness's Curriculum Vitae will be provided to defense counsel in advance of trial.

Bases and Reasons for Opinions: The referenced witness tested several different batches of evidence. For each batch he will testify concerning her analysis of evidence in this case. He will testify as to her procedure and methodology for testing for controlled substances, her handling of evidence and her documentation of same. The witness will testify that her analysis involved the application of scientific disciplines including chemistry and forensic science.

Case Number MG-19-0050

LIMS Number 2019-SFL6-04023

Items analyzed:

1 unit of multilayered packaging, 426.1 grams

Results of analysis:

Unit tested positive for methamphetamine Hydrochloride, 422.7 grams +/- 25.8 grams. Salt form and isomer determined from testing the composite

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography, Gas Chromatography/Mass Spectrometry, Infrared Spectroscopy
- DEA 220H/Nuclear Resonance Spectroscopy

Case Number MG-19-0050

LIMS Number 2019-SFL6-04024

Items analyzed:

1 unit package containing 2.29 grams

Results of analysis:

Unit tested positive for methamphetamine Hydrochloride amount of pure substance, 2.36 grams +/- 0.15 grams.

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography, Gas Chromatography/Mass Spectrometry, Infrared Spectroscopy
- DEA 220H/Nuclear Magnetic Resonance Spectroscopy

Opinions, Findings and Conclusions: The information contained herein is merely a summary of the witness' analysis, findings and conclusion. The witness has produced a report. Witness will testify consistent with the prepared report and identify the evidence he analyzed, all of which are included in the government's discovery in this case.

Kelly S. Taulbee

Senior Criminalist, Oklahoma State Bureau of Investigation

Qualifications: Witness's Curriculum Vitae will be provided to defense counsel in advance of trial.

Bases and Reasons for Opinions: The referenced witness will testify concerning his analysis of two batches of evidence in this case. He will testify as to his procedure and methodology for testing for controlled substances, his handling of evidence and his documentation of same. The witness will testify that his analysis involved the application of scientific disciplines including chemistry and forensic science.

Lab Report 2020-012465

Items analyzed:

1A one plastic evidence bag "1" containing one rubber banded plastic bag containing a crystalline substance, net weight 99.93 grams.

1B one plastic evidence bag "2" containing one clear plastic zip lock bag containing a crystalline substance, net weight 20.31 grams.

1C one plastic evidence bag "3" containing one clear plastic zip lock bag containing a crystalline substance, net weight 17.13 grams.

One plastic evidence bag "4" containing a green leafy substance, gross weight 90.32

Results of analysis:

1A, 1B, 1C Methamphetamine, Schedule II, total net weight 137.37 grams +/- 0.15 grams

1D Delta 9-Tetrahydrocannabinol, Schedule III and Cannabidiol.

In general, the witness applied analysis and testing which consisted of the following steps:

- Gas Chromatography with Flame Ionization Detector and Gas Chromatography with Mass Spectrometry
- Microscope Visual exam

Opinions, Findings and Conclusions: The information contained herein is merely a

summary of the witness' analysis, findings and conclusion. The witness has produced a report. Witness will testify consistent with the prepared report and identify the evidence he analyzed, all of which are included in the government's discovery in this case.

Stacey M. Loggins

Senior Fingerprint Specialist, Drug Enforcement Administration

Qualifications: Witness's Curriculum Vitae will be provided to defense counsel in advance of trial.

Bases and Reasons for Opinions: The referenced witness will testify concerning his analysis of two batches of evidence in this case. He will testify as to his procedure and methodology for testing for controlled substances, his handling of evidence and his documentation of same. The witness will testify that his analysis involved the application of scientific disciplines including chemistry and forensic science.

Case Number MG-19-0050

LIMS Number 2019-SFL6-04025

Item analyzed: one glass smoking pipe

Results of analysis:

No latent prints suitable for identification were developed.

Case Number MG-19-0050

LIMS Number 2019-SFL6-04026

Items analyzed:

One silver US-Glacier brand digital scale, one clear plastic scale cover, two AAA large batteries and one plastic battery cover.

Results of analysis:

One latent print suitable for identification on one US-Glacier brand scale.

No latent prints suitable for identification were developed from the remaining specimens.

The latent print from the digital scale was identified to Shauni Breanne Putney.

Case Number MG-19-0050
LIMS Number 2021-SFL6-02447

Items analyzed: Four bundles wrapped in black tape

Results of analysis:

No latent prints suitable for comparison were developed.

Opinions, Findings and Conclusions: The information contained herein is merely a summary of the witness' analysis, findings and conclusion. The witness has produced a report. Witness will testify consistent with the prepared report and identify the evidence he analyzed, all of which are included in the government's discovery in this case.

Sergeant Jared Diederich
Bakersfield Police Department

Sergeant Diederich will testify concerning the training of Sergeant Diederich and his dog, Marc, in the field of Narcotic Canine Detection. Specifically, he will testify to Marc's alerting him to the presence of narcotics on currency found from the April 10, 2019, search of 225 Marsh Street, Bakersfield, California. Sergeant Diederich's CV and the Certificate of completion of K9 Narcotics Detection training for himself and Marc have been produced to defense.

Respectfully submitted,

CLINTON J. JOHNSON
United States Attorney

/s/ Melody N. Nelson
Melody N. Nelson, OBA No. 16467
Assistant United States Attorney
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Tulsa, Oklahoma 74119-1029
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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of July, 2022, I submitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Craig Hoehns,
Counsel for Shauni Breanne Callagy

Andrew Casey
Counsel for Jesus Valdez Martinez

Scott Troy,
Counsel for Renee Lynn Haynes

Shena Burgess
Counsel for William Johnson, III

Michael Noland,
Counsel for Luis Alfredo Jacobo

Alyssa Ferrell
Counsel for Tony Garcia

Lance Phillips,
Counsel for Kelly Wayne Bryan

Terry Weber,
Counsel for Curtis Anthony Jones

Douglas G. Smith
Counsel for Gene Rast

/s/ Melody N. Nelson
Melody N. Nelson
Assistant United States Attorney